



June 27, 2018

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: Copper Retirement Network Change Notification Filed by ACS of Anchorage, LLC,
WC Docket No. 18-192

Dear Ms. Dortch,

By this letter, as requested by the Wireline Competition Bureau staff, ACS of Anchorage, LLC ("ACS of Anchorage") provides the updates described herein to its "Public Notice of Copper Retirement Under Rule 51.333 and Request for Waiver of Section 51.333(a)(2) of the Commission's Rules" (the "Original Notice"), which was filed in the above-referenced docket on June 6, 2018 regarding planned copper retirement activities in the Bootlegger's Cove neighborhood of Anchorage, Alaska.

First, on June 14, 2018 ACS of Anchorage sent a revised "Public Notice of Copper Retirement Under Rule 51.333" (the "Revised Notice") to GCI Liberty, Inc. ("GCI Liberty"), the only telephone exchange service provider that directly interconnects with the ACS of Anchorage network in the affected area. The Revised Notice provides additional information on steps that ACS of Anchorage is taking to minimize the impact of the abbreviated notice period on GCI Liberty. ACS of Anchorage now submits that Revised Notice to the Commission as **Exhibit A** to this letter. An updated "Certification of Public Notice of Copper Retirement Under Rule 51.333" is also provided as **Exhibit B** hereto.

Second, ACS of Anchorage hereby withdraws the request for waiver of Section 51.333(a)(2) of the Commission's rules, 47 C.F.R. § 51.333(a)(2). Because five business days have now elapsed since ACS of Anchorage sent the Revised Notice to GCI Liberty, a waiver of that waiting period is no longer necessary.

Third, ACS of Anchorage confirms that it will continue to offer wireline telephone exchange service to all of its telephone exchange customers in the affected area of Bootlegger's Cove following the retirement of copper described in the Revised Notice. That service will be provided to any customer that elects it under a resale arrangement between ACS of Anchorage and GCI Liberty, under which ACS of Anchorage will resell GCI Liberty's wireline telephone exchange service, which is currently available throughout the area over GCI Liberty's cable-based wireline facilities. ACS of Anchorage will *also* offer new broadband services in the area



using newly-deployed fixed wireless facilities, providing additional competitive service options to those customers that elect to purchase them. Each customer in the area will have complete discretion whether to purchase either or both services from ACS of Anchorage, or from a different service provider entirely.

Fourth, ACS of Anchorage confirms that it expects to receive definitive notice of the undergrounding plans of Municipal Light and Power (“MLP”) in the Bootlegger’s Cove area on or about July 15, 2018. Following receipt of that notice, ACS of Anchorage will have no more than 30 days to remove its aerial facilities from the affected MLP poles in Bootlegger’s Cove. Given the abbreviated and uncertain notice period, it is infeasible for ACS of Anchorage to provide the full 90-day notice period otherwise prescribed in Section 51.333(b)(2) of the Commission’s rules, 47 C.F.R. § 51.333(b)(2).

Please do not hesitate to contact me should you have any additional questions. Thank you for your attention to this matter.

Very truly yours,

A handwritten signature in blue ink that reads 'Lisa Phillips'.

Lisa Phillips
Senior Manager, Regulatory Affairs
and Risk Management

Secretary

**Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554**

Carmell Weathers

**Wireline Competition Bureau
Competition Policy Division
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554**

June 6, 2018

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RE: ACS of Anchorage, LLC Public Notice of Copper Retirement Under 47 C.F.R. § 51.333

Dear Ms. Dortch:

Pursuant to Section 51.333 of the Commission's rules, 47 C.F.R. § 51.333, ACS of Anchorage, LLC hereby submits the attached Public Notice of Copper Retirement Under Section 51.333 of the Commission's rules.

This filing is being made through the FCC's Electronic Comment Filing System.

Please contact me at 907.297.3130 if you have any questions concerning this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Lisa Phillips', with a stylized flourish at the end.

Lisa Phillips
Senior Manager, Regulatory Affairs and
Risk Management

Attachments



Public Notice of Copper Retirement Under Rule 51.333
ACS of Anchorage, LLC's Internet address: <http://www.acsalaska.com>

June 14, 2018

RE: Network Change Notification

Carrier: ACS of Anchorage, LLC d/b/a Alaska Communications, 600 Telephone Ave., Anchorage, Alaska 99503

Implementation Date:

This network change has been scheduled for August 1-15, 2018.

Description of the Planned Network Change:

Anchorage Municipal Light and Power has informed Alaska Communications that it will be removing its poles in the Bootleggers Cove area of Anchorage this summer, and that the work will be complete by August 15, 2018. As a result, Alaska Communications is required to remove its aerial copper facilities from those poles before that date. As Alaska Communications did not receive notice of this work more than 90 days in advance of the completion date, it was not possible to comply with the Commission's mandatory 90-day notice period governing retirement of copper. Pursuant to 51.333(g)(2) Alaska Communications requests a limited exemption from advance notice and timing requirements for copper retirement. Alaska Communications expects to complete this work between August 1 and August 15, 2018.

Description of Reasonably Foreseeable Impact(s) of the Planned Change(s):

Alaska Communications provides circuit-switched voice telephone service over copper last mile distribution lines to approximately 40 residential customers in Bootleggers Cove that will be affected by this work, and its lines pass approximately 200 additional customer locations that do not take service from Alaska Communications. The cost of deploying new underground lines to serve this small number of affected customers is economically prohibitive; therefore, Alaska Communications intends to retire the aerial copper lines and not deploy new underground facilities in the area.

Steps Taken to Minimize the Impact of the Reduced Waiting Period on Directly Interconnected Telecommunications Service Providers

Alaska Communications will cooperate and closely coordinate with GCI to ensure the transition proceeds smoothly despite the abbreviated notice period. GCI purchases no unbundled network elements in the affected area. In addition, Alaska Communications will put an agreement in place and provide all necessary information on a timely basis to ensure a smooth transition for any customers electing to purchase resold GCI telephone exchange services. To Alaska Communications' knowledge there will be no changes to routing or programming switch tables.

The Planned Network Change Will Occur at the Following Location:

Bootlegger's Cove, Anchorage, Alaska 99501

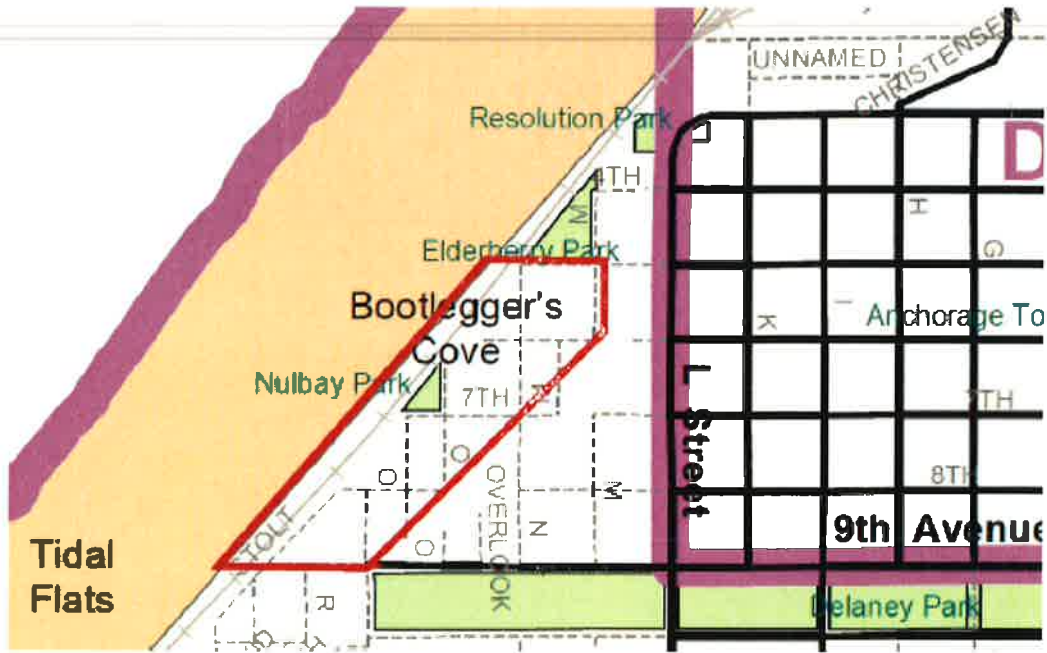


**Technical
Contact**

Stuart Chasse, Network Engineering Foreman
907-564-1789

**Interconnection
Contact**

Kerri Lookabaugh, Service Assurance Manager
907-565-6678



**Certification of Public Notice of Copper Retirement Under
Rule 51.333**

I, Lisa Phillips, certify as follows:

On June 14, 2018, I served a copy of the "Public Notice of Copper Retirement under Rule 51.333" relating to a planned retirement of copper in the area of Bootleggers Cove in Anchorage, Alaska, upon each telephone exchange service provider that directly interconnects with the incumbent LEC's network. The name and address of each telephone exchange service provider upon which the notice was served is as follows:

Mary Devore
Carrier Relations Director
GCI Liberty, Inc.
2550 Denali Street, Suite 1000
Anchorage, AK 99503
mdevore@gci.com

Under penalty of perjury, the foregoing is true and correct, to the best of my knowledge, information, and belief.



Lisa Phillips
Senior Manager, Regulatory Affairs and
Risk Management